

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

UNIVERSAL LIFE CHURCH MONASTERY
STOREHOUSE, a Washington non-profit
corporation,

Plaintiff,

v.

MAURICE KING; LEWIS KING; GLEN
YOSHIOKA; DYLAN WALL; SARA WHITE;
and AMERICAN MARRIAGE MINISTRIES, a
Washington non-profit corporation,

Defendants.

AMERICAN MARRIAGE MINISTRIES, a

Counter-Claimant and
Third-Party Plaintiff,

v.

UNIVERSAL LIFE CHURCH MONASTERY
STOREHOUSE; UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, INC.,

Counter-Defendant and
Third-Party Defendant.

Case No. 2:19-cv-00301-RSL

DEFENDANT AMERICAN
MARRIAGE MINISTRIES' FIRST SET
OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF

**WITH PLAINTIFF'S RESPONSES
THERE TO**

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AMERICAN MARRIAGE MINISTRIES' FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS – **WITH PLAINTIFF'S RESPONSES THERETO**

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**TO: Plaintiff Universal Life Church Monastery Storehouse; and its
counsel of record, Michael P. Matesky, II, Matesky Law LLC
1001 4th Ave., Suite 3200, Seattle, WA 98154; Michael B. Galletch,
Puget Sound Business & Litigation PLLC, 411 University Street, Suite 1200,
Seattle, WA 98101**

Pursuant to Federal Rules of Civil Procedure 26, 33, and 34, Defendant, Counter-Claimant (“AMM”) requests that Plaintiff and Counter-Defendant Universal Life Church Monastery Storehouse (referred to herein as “ULC”) respond in writing, under oath, to the following Interrogatories and Requests for Production (“Requests”) and produce for inspection and/or copying each of the items, documents, and/or things falling within the categories set forth below within thirty (30) days of service of these Requests. ULC’s responses, as well as the documents, items, and/or things requested in these Requests shall be produced to Foster Pepper PLLC, 1111 Third Ave, Suite 3000, Seattle, WA 98110.

DEFINITIONS

As used in these Requests, the following definitions shall apply unless otherwise noted:

1. “AMM” means American Marriage Ministries, or any predecessors or successors in interest, all parents, subsidiaries, sisters, affiliates, and divisions, as well as current and former assigns, agents, employees, officers, directors, partners, attorneys, and any other persons or entities acting or purporting to act on behalf of any of them.

2. “And” & “Or.” The words “and” and “or” should not be interpreted to exclude any information from any answer or response. Both words should therefore be interpreted to mean “and/or” when necessary to prevent such exclusion.

3. “COMMUNICATION(S)” means any form of information exchange, or attempted exchange, including but not limited to written, oral, or electronic exchanges; exchanges by letter, telephone, facsimile, email, face-to-face conversation, meeting or conference; any exchange whether or not written, taped, or recorded; any exchange without limit to the time, place, or circumstances of its occurrence; and/or any other transmittal of information by any media by any

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1 manner.

2 4. "DOCUMENT(S)" means any form of writing and includes without limitation: the
3 original or a copy as well as drafts and all versions of all writings and recordings; material that is
4 stored, compiled, or organized by means of any electronic, magnetic, optical, or mechanical
5 device such as by handwriting, typewriting, printing, photostating, or filming; agreements,
6 analytical data, art work, audio recordings, books, bulletins, calendars, computer tapes, computer
7 storage media, contracts, correspondence, diagrams, diaries, drawings, email, facsimiles, forms,
8 interoffice communications, keypunch cards, letters, memoranda, messages, notes, papers,
9 photographs, pictures, pleadings, proposals, reports, studies, surveys, sketches, telexes, telegrams,
10 telecopies, telegraphs, telex communications, video recordings, and worksheets; and any writing
11 or recording prepared on or with any other physical objects.

12 5. "EVIDENCE" includes facts, the identity of all persons with knowledge,
13 testimony of witnesses, documents, material objects, sounds, recordings, or other things presented
14 to the senses that are offered to prove the existence or nonexistence of a fact.

15 6. "IDENTIFY" means: (a) when used in reference to a natural person, state his or
16 her full name, address, and telephone number; (b) when used in reference to a corporate, state its
17 full corporate name, any names under which it does business, and its place of incorporation;
18 (c) when used in reference to a partnership, state its full name, any name under which it does
19 business, the place or any certificate of partnership (or other similar document) filing, and the
20 address of its principal place of business; (d) when used in reference to a document, state the
21 document, litigation number or Bates number, if applicable, otherwise the number of pages and
22 the nature of the document (e.g., letter, memorandum, etc.), its title, its date, the name or names
23 of its authors or recipients, and its present location or custodian; (e) when used in reference to a
24 communication, if any part of the communication was written, identify the document or
25 documents which refer to, relate to, or evidence the communication, and, to the extent that the
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1 communication was non-written, identify the persons, participating in or witnessing the
2 communication, and state the date and substance of the communication.

3 7. "PERSON(S)" means not only natural persons but also firms, partnerships,
4 associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships,
5 syndicates, trusts, groups, and organizations; federal, state, or local governments or government
6 agencies, offices, bureaus, departments, or entities; other legal, business, or government entities;
7 and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof or any
8 combination thereof.

9 8. "RELATED TO" means relating to, reflecting, concerning, referring to,
10 constituting, embodying, connected to, in connection with, comprising, regarding, evidencing,
11 describing, identifying, stating, analyzing, containing information concerning, and/or in any way
12 pertaining to the subject matter of this action.

13 9. "UNIVERSAL LIFE CHURCH" means the religious organization by that name
14 that was founded in the 1960s and is based in Modesto, California.

15 10. "ULC," "YOU," or "YOUR" means the responding party (Plaintiff and Counter-
16 Defendant Universal Life Church Monastery Storehouse and Third-Party Defendant Universal
17 Life Church Monastery Storehouse, Inc.), your affiliates, your employees or agents, your
18 insurance companies, their agents, their employees, your attorneys, their agents, their employees,
19 your accountants, your investigators, and anyone else acting or purporting to act on your behalf.

20 The use of the singular or plural form of a word should not be construed to exclude any
21 information from any answer or response. The plural should, therefore, include the singular, and
22 the singular should, therefore, include the plural when necessary to prevent such exclusion.

23 INSTRUCTIONS FOR INTERROGATORIES

24 1. If any of these Interrogatories cannot be answered in full, you must answer to the
25 extent possible, specifying the reason for your inability to answer the remainder and stating
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1 whatever information, knowledge, or belief you have concerning the unanswered portion.

2
3
4 **PRELIMINARY STATEMENT AS TO RESPONSES**

5 Each of the responses below is made solely for the purpose of this action. Each response
6 is subject to all objections as to competence, relevance, materiality, propriety and admissibility
7 and any and all other objections or grounds that will require the exclusion of any response herein
8 at the time of trial, all of which objections and grounds are reserved and may be interposed at the
9 time of trial, or prior as necessary. Plaintiff Universal Life Church Monastery Storehouse, as the
10 responding party ("**ULC Monastery**"), reserves the right to make changes to these responses if it
11 appears that omissions or errors have been made herein, further or more accurate information
12 becomes available and/or additional documents are discovered. The fact that ULC Monastery
13 responded to all or any part of a request is not intended and shall not be construed to be a waiver
14 of all or any part of the objection to such request.

15
16 **GENERAL OBJECTIONS BY ULC MONASTERY**

17 1. ULC Monastery objects to these interrogatories and requests for production, as well
18 as the instructions and definitions, to the extent that they purport to impose any obligation beyond
19 those specified in the Fed.R.Civ.Pro., including Rules 26 and 33-34, and to the extent that they
20 request information beyond the scope of inquiry permitted by Fed.R.Civ.Pro. 26.

21
22 2. ULC Monastery objects to all requests that attempt to require it to provide
23 information not within its possession or custody or control. ULC Monastery specifically objects
24 to Definition No. 10 as inaccurate and misleading. Defendant AMM has actual knowledge that
25 there is no entity "Universal Life Church Monastery Storehouse, Inc.," and that fact is readily
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1 available in public records and ULC Monastery has previously advised AMM of this fact. Only
2 Plaintiff ULC Monastery is responding to these interrogatories and requests for production, and
3 all responses hereto are by Plaintiff ULC Monastery only.

4 3. The absence of an objection that a request is irrelevant is not intended to be a waiver
5 of that objection and ULC Monastery reserves the right to object on relevancy grounds at any stage
6 of these proceedings.

7 4. When ULC Monastery objects to a request, a subsequent response to the request
8 shall not constitute a waiver of the objection. Furthermore, the failure to restate a general objection
9 in response to a specific request does not waive the general objection.

10 5. ULC Monastery objects to each and every request to the extent the same seeks
11 information protected by the right to privacy, the attorney-client privilege, the attorney-work
12 product doctrine and/or any other applicable privilege or doctrine.

13 6. ULC Monastery objects to the introduction, direction, and definitions in the
14 requests to the extent they are different than or inconsistent with the applicable Fed.R.Civ.Pro. or
15 Local Court Rules.

16 7. ULC Monastery objects to the breadth of Definition No. 1. ULC Monastery is
17 aware of Defendant AMM as an entity, and is either unaware of, or does not have sufficient
18 knowledge and information as to, all of the entities and individuals purportedly to be included as
19 part of the definition.

20 8. ULC Monastery objects to Definition No. 8 as vague and ambiguous, and to the
21 extent it imposes undue burden to produce responsive information and documents “related to” any
22 subject matter.

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9. ULC Monastery objects to Definition No. 9 as it is unclear whether the term “UNIVERSAL LIFE CHURCH” refers only to Universal Life Church, Inc., or to any entity that is related to, or exhibits a spiritual kinship with, the Universal Life Church originated by Kirby Hensley. ULC Monastery uses the term “California ULC” to refer to Universal Life Church, Inc. herein.

The foregoing objections are incorporated into all responses set forth below. Subject to and without waiving any general objections as stated above and any specific objections asserted to particular requests, ULC Monastery provides the following responses:

INTERROGATORIES

INTERROGATORY NO. 1: IDENTIFY each and every statement made by AMM which YOU contend is false, confusing, misleading, or deceptive and for every such statement IDENTIFY any individual you contend was involved in making said statement and describe their alleged involvement.

ANSWER:

Plaintiff ULC Monastery objects to this interrogatory as unduly broad, overly burdensome, and not calculated to lead to the discovery of admissible evidence to the extent it requests Plaintiff to “identify each and every” responsive statement “made by AMM,” regardless of such statement’s relationship to Plaintiff or this litigation, or any time limitation, especially considering the unduly broad definition of “AMM.” Subject to the foregoing objections, Plaintiff answers as follows regarding statements related to this litigation:

The AMM-vs-ULC Website:

1. “There are two major organizations when it comes to online ordination.”

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1 There are more than two organizations. These include, but are not limited to, the California
 2 ULC; Wanderlust Bay Ministries; American Fellowship Church; Church of the Latter-Day Dude;
 3 First Nation Church; Open Ministry; Christian Harvest Church; Christian Global Outreach
 4 (ministernow.org); First Nation Ministry; and Universal Life Church Seminary.

5 2. “There are two major organizations when it comes to online ordination, American
 6 Marriage Ministries (AMM) and the Universal Life Church Monastery (ULC Monastery).”

7 AMM is not a major organization when it comes to online ordination.

8 3. “AMM and the ULC Monastery are the two most established options”

9 AMM is not one of the two most established options for online ordinations, by any
 10 reasonable metric.

11 4. “Since AMM and the ULC Monastery are the *two most established options*, we’ve
 12 created a side-by-side comparison to help.”

13 This statement falsely claims that AMM is presenting a side-by-side comparison between
 14 AMM and ULC Monastery, when AMM actually compares itself to the California ULC, and
 15 deceptively attributes acts of the California ULC to ULC Monastery, although they are separate
 16 and distinct entities.

17 5. “The Federal government recognizes AMM as a 501(c)3 tax exempt church.”

18 Defendant AMM is not a church. Its website states it is “public charitable organization.”
 19 The August 27, 2015 letter purportedly from the Internal Revenue Service, posted on Defendant
 20 AMM’s website, states that AMM “is a public charity.” Further, the Court of the District of
 21 Columbia ruled Defendant AMM does not “subscribe to some theological doctrine or moral
 22 principle.” ULC Monastery is unaware of any facts that support the statement that the “federal
 23 government recognizes” Defendant AMM “as a church.”

24 6. “The original Universal Life Church...has been in and out of the courtroom ever
 25 since.”

1 The statement provides a hyperlink that references the California ULC, and not ULC
 2 Monastery. The statement is also preceded by the statement that it is “a side-by-side comparison”
 3 of ULC Monastery and Defendant AMM. The statement falsely attributes the allegation that the
 4 California ULC “has been in and out of the courtroom” to ULC Monastery, when the California
 5 ULC are ULC Monastery separate and distinct entities. The statement creates the false impression
 6 that ULC Monastery “has been in and out of the courtroom”.

7 7. All of the following statements

- 8 • The Universal Life Church has had their **IRS non-profit status revoked.**
- 9 • **The ULC has been embroiled in fraud allegations.**
- 10 • **The ULC has been in and out of bankruptcy.**
- 11 • And, most importantly, **marriages performed by ULC ministers have been ruled invalid.**

12 are false, misleading, deceptive and/or confusing because they equate Plaintiff ULC
 13 Monastery with the California ULC. The four statements are preceded by the statement that it is
 14 “a side-by-side comparison” of ULC Monastery and Defendant AMM. The statements falsely
 15 attribute the alleged financial and legal troubles of the California ULC to ULC Monastery, when
 16 the California ULC and ULC Monastery are separate and distinct entities, none of the four
 17 statements describe circumstances or actions involving ULC Monastery, none of the four
 18 statements are accurate in reference to ULC Monastery, and the hyperlinks provided are as to
 19 California ULC not to ULC Monastery. Each of the four statements create the false impression
 20 that ULC Monastery has had its IRS non-profit status revoked, has been involved in fraud
 21 allegations, has been in and out of bankruptcy, and marriages performed by its minsters are invalid.

22 8. “The Universal Life Church has had their IRS non-profit status revoked”

23 The statement provides a hyperlink to an opinion issued in *In re Universal Life Church,*
 24 *Inc.*, 123 F.3d 1294 (9th Cir. 1977). The statement is preceded by the statement that it is “a side-
 25 by-side comparison” of ULC Monastery and Defendant AMM. ULC Monastery was not a party
 26 to and was not otherwise involved in *In re Universal Life Church, Inc.* The statement falsely

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1 attributes the alleged IRS non-profit revocation of the California ULC to ULC Monastery, when
 2 the California ULC and ULC Monastery are separate and distinct entities, and ULC Monastery
 3 has not had its IRS non-profit status revoked. The statement creates the false impression that ULC
 4 Monastery has had its IRS non-profit status revoked.

5 Further, the hyperlinked opinion refers to a revocation which is only for a three year period,
 6 whereas the California ULC had maintained non-profit status aside from that period, as the
 7 hyperlink AMM provides for the statements “The ULC has been embroiled in fraud allegations”
 8 demonstrates (https://scholar.google.com/scholar_case?case=6603493875619580621). To the
 9 knowledge of ULC Monastery, the California ULC is currently recognized as a non-profit entity.
 10 The statement creates the false impression that the California ULC is a for profit organization, and
 11 that ULC Monastery is also for-profit organization.

12 9. “The ULC has been embroiled in fraud allegations.”

13 The statement contains a hyperlink to an opinion issued in *Lynch v. Universal Life Church,*
 14 *Inc.*, 775 F.2d 576 (4th Cir. 1985). The statement is preceded by the statement that it is “a side-
 15 by-side comparison” of ULC Monastery and Defendant AMM. ULC Monastery has never been
 16 embroiled in fraud allegations and was not a party to, or otherwise involved in, *Lynch v. Universal*
 17 *Life Church, Inc.* The statement falsely attributes the alleged fraud allegations against the
 18 California ULC to ULC Monastery, when the California ULC and ULC Monastery are separate
 19 and distinct entities, and ULC Monastery has not been embroiled in fraud allegations. The
 20 statement creates the false impression that ULC Monastery has been embroiled in fraud
 21 allegations.

22 Further, the statement references but one allegation against the California ULC, which
 23 occurred in August 1981, and that claim was unsuccessful. The statement states, or at least implies
 24 and suggests, there is more than one allegation or that the allegations of fraud are deep and
 25 ongoing.

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1 10. “The ULC has been in and out of bankruptcy.”

2 The statement contains a hyperlink to an opinion in *In re Universal Life Church, Inc.*, 123
3 F.3d 1294 (9th Cir. 1977). The statement is preceded by the statement that it is “a side-by-side
4 comparison” of ULC Monastery and Defendant AMM. ULC Monastery has never declared
5 bankruptcy and was not a party to, or otherwise involved in, *In re Universal Life Church, Inc.*, 123
6 F.3d 1294 (9th Cir. 1977). The statement falsely attributes the alleged bankruptcy of the California
7 ULC to ULC Monastery, when the California ULC and ULC Monastery are separate and distinct
8 entities, and ULC Monastery has not declared bankruptcy. The statement creates the false
9 impression that ULC Monastery has declared bankruptcy not only once, but multiple times.

10 Further, the statement references but one instance of the California ULC filing for
11 bankruptcy, which occurred in November 1989. The statement states, or at least implies and
12 suggests, there is more than filing or that the California ULC has filed multiple petitions.

13 11. “And most importantly, marriages performed by ULC ministers have been ruled
14 invalid.

15 The statement provides a hyperlink to an opinion issued in *Ranieri v. Ranieri*, 146
16 A.D.2d 34 (Super. Ct. N.Y. 1989). The statement is preceded by the statement that it is “a
17 side-by-side comparison” of ULC Monastery and Defendant AMM. The marriage at issue in
18 *Ranieri v. Ranieri* was not performed by a ULC Monastery minister. The statement creates
19 the false impression that the marriage at issue in *Ranieri v. Ranieri* was performed by a ULC
20 Monastery minister.

21 12. “American Marriage Ministries is an IRS 501.c.3 Certified organization.”

22 The IRS does not “certify” an organization, and Defendant AMM has not been certified.
23 The statement, particularly when capitalizing the “C” in certified, falsely states, or at least suggests
24 and implies, AMM has both met or achieved some criteria in order to be “Certified” and that it has
25 in fact received a governmental certification, and that, in comparison to ULC Monastery, AMM
26

has received such certification while ULC Monastery has not.

13. "...talk to your local county clerk about which online churches they accept."

Defendant AMM is not a church. This statement falsely states, or at least suggests and implies, that it is. AMM's own website states it is "public charitable organization." The August 27, 2015 letter purportedly from the Internal Revenue Service, posted on Defendant AMM's website states that AMM "is a public charity." Further, the Court of the District of Columbia ruled Defendant AMM does not "subscribe to some theological doctrine or moral principle."

14. The statements:

and to the best of our knowledge, the federal government does not recognize the ULC Monastery as a 501c3 church.

There is only one American Marriage Ministries, and it is a **Federally Recognized 501c3 Charitable Organization**. The legal standing of the organization that issues your ordination matters, so make sure to do your research!

The statements together falsely state, or at least suggest and imply, that the federal government must recognize an organization in order that organization's ministers to be legally able to officiate a marriage or civil union; that because the ULC Monastery is not so recognized it does not have legal standing and in addition its ministers may not legally officiate a wedding; that because AMM is "federally recognized" it has legal standing and its ministers may legally officiate a wedding; and that any visitor to the site who is contemplating becoming ordained through the ULC Monastery should not do so because of the lack of "federal recognition." Recognition by the Internal Revenue Service, after the IRS's review of an application on the IRS form series 1023, as a tax-exempt organization is not a condition or pre-requisite for legal standing, and is not a condition or pre-requisite for a religious organization's ministers to be legally able to officiate a marriage.

15. "On the Clark County's official list of recognized churches, AMM appears on the

1 first page.”

2 The list by Clark County states that it is a list of “organizations Clark County [has]
3 approved to issue the Affidavit of Authority to Solemnize Marriages as they have provided the
4 necessary documents showing that they are a church or religious organization that is incorporated,
5 organized or established in Nevada as required by NRS Chapter 122.” The list is not just churches,
6 and AMM’s statement falsely states, or at least suggests and implies, it is a church and a church
7 “recognized” by Clark County, an official governmental entity.

8 The statement further falsely states, or at least suggests and implies, that ministers
9 ordained by ULC Monastery may not officiate a wedding in Clark County, when NRS Chapter
10 122 expressly permits them to do so.

11 16. “This website is run by ministers that are affiliated with American Marriage
12 Ministries.”

13 AMM admitted that it, as an entity, “created, operated, published, communicated, and used
14 in commerce” The AMM-vs-ULC Website. This statement states, or at least suggests or implies,
15 that ministers ordained by AMM, and not AMM as an entity, created, operate, publish,
16 communicate, and use in commerce the AMM-vs-ULC Website.

17 17. “If you are wondering whether to get ordained online with another church...”

18 This statement falsely states, or at least suggests and implies, that AMM is a church. AMM
19 is not a church.

20
21 The AMM Legal Website

22 1. “IRS 501 c3 Certified Non-Profit Ministry.”

23 AMM is not a church, and the IRS does not “certify” an organization, and Defendant AMM
24 has not been certified. The statement, particularly when coupled with the use of logo and insignia
25 of the US Treasury, states, or at least suggests and implies, (a) AMM has received a governmental
26

1 certification when (i) the government does not provide any such certification and (ii) AMM has
 2 not received any certification from the federal government; and (b) falsely compares AMM to
 3 ULC Monastery, with the comparison being AMM has received a certification while ULC
 4 Monastery has not.

5 2. “There are people who have made millions of dollars selling ordinations, and our
 6 free online ordinations are making it more difficult for them to take your money. They are behind
 7 that anonymous, and misleading website that incorrectly states that weddings ‘may not be legally
 8 valid.’”

9 The statements refer to Plaintiff ULC Monastery, as the “they” referred to is the
 10 organization “behind” the website stating that weddings “may not be legally valid.” The “may
 11 not be legally valid” statement is referring to the website “americanmarriageministries.com,”
 12 operated by Plaintiff ULC Monastery. So, the statement states, or at least suggests or implies,
 13 that ULC Monastery sells ordinations. ULC Monastery does not sell ordinations, and Defendants
 14 are aware that ULC Monastery does not sell ordinations. This statement also falsely compares
 15 AMM to ULC Monastery, by falsely stating, or at least suggesting or implying, that ordination
 16 from Defendant AMM is free while ordination through ULC Monastery is not.

17 Further, the statement also contains a hyperlink to an article that is about the California
 18 ULC, and not ULC Monastery. The statements therefore state, if not suggest and imply, that the
 19 California ULC and the ULC Monastery are one in the same, when they are separate and distinct
 20 entities.

21 3. “AMM has an established theological doctrine.”

22 AMM does not have an established theological doctrine, and is not a church. AMM’s own
 23 website states it is “public charitable organization.” The August 27, 2015 letter purportedly from
 24 the Internal Revenue Service, posted on Defendant AMM’s website states that AMM “is a public
 25 charity.” Further, the Court of the District of Columbia ruled Defendant AMM does not “subscribe
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1 to some theological doctrine or moral principle.”

2 4. “...states like Tennessee are targeting specific organizations, and not American
3 Marriage Ministries.”

4 This statement falsely or deceptively states, if not suggests and implies, that the state of
5 Tennessee is targeting ULC Monastery. The state of Tennessee is not targeting ULC Monastery.
6 Further, the February 6, 2015 opinion of the Tennessee Attorney General, opinion No. 15-14,
7 refers to the California ULC and not ULC Monastery. To the extent such Opinion applies to ULC
8 Monastery, it applies at least as equally to AMM. AMM’s statement on the website falsely states,
9 if not suggests and implies, that its ministers are legally able to solemnize a marriage when
10 ministers of ULC Monastery cannot.

11 5. “AMM is a federally recognized 501c(3) charitable organization, which gives it the
12 public legitimacy of IRS recognition.”

13 This statement falsely states, or at least implies and suggests, that the IRS or federal
14 government can provide to entities some level of legitimacy or legal approval; that the IRS or
15 federal government has done so for AMM, or that AMM obtained the same; that ULC Monastery
16 does not possess the same “public legitimacy”; that ordination through AMM is backed or
17 supported by the IRS or federal government; and that ordinations through ULC Monastery are not
18 and therefore may not be legal or valid.

19 6. “With dozens of rulings against the Universal Life Church for tax fraud, denial of
20 validity of ULC ordinations, and millions of dollars in fines levied against the Universal Life
21 Church, ...”

22 The California ULC and ULC Monastery are separate and distinct entities. The statements
23 falsely attribute the alleged financial and legal troubles of the California ULC to ULC Monastery,
24 when the California ULC and ULC Monastery are separate and distinct entities, none of the
25 statements regarding alleged tax fraud, denial of validity of ordinations, or millions of dollars in
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DOCUMENTS - WITH PLAINTIFF’S RESPONSES THERETO - 14

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1 fines involve or apply to ULC Monastery. Further, the bullet-pointed sub-statements contain
 2 hyperlinks which are as to the California ULC not to ULC Monastery. The statements create the
 3 false impression that ULC Monastery has engaged in tax fraud, had millions of dollars of fines
 4 levied against it, and marriages performed by its ministers are invalid.

5 7. "This website is run by ministers that are affiliated with American Marriage
 6 Ministries."

7 This statement falsely states, or at least suggests or implies, that AMM-ordained ministers,
 8 and not AMM as an entity, created and run the website. AMM admitted that it, as an entity,
 9 "created, operated, published, communicated, and used in commerce" The AMM-vs-ULC
 10 Website.

11
 12 All Defendants were involved in the all of the statements above. Defendant AMM admitted
 13 it "created, operated, published, communicated, and used" the two above-referenced websites. All
 14 of the Individual Defendants are governing persons of AMM; all are board members of AMM;
 15 and Defendant Yoshioka testified that (1) the executive director and the board of directors of AMM
 16 decide what content is displayed on the websites operated by AMM; and (2) Defendant Lewis
 17 King is the current "executive director" or "executive manager" of AMM and "is primarily
 18 responsible for the content" on the sites.

19 Discovery in this matter has recently begun, and ULC Monastery is conducting discovery.
 20 As further facts and information becomes available, ULC Monastery may supplement this
 21 response, and will supplement as required under the Fed.R.Civ.Pro.

22
 23 **INTERROGATORY NO. 2:** For each statement identified in response to Interrogatory No. 1,
 24 explain the complete factual basis for YOUR contention that the statement is false, confusing,
 25 misleading, or deceptive.

26
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1 **ANSWER:**

2 *See* Response to Interrogatory no. 1 above.

3
4 **INTERROGATORY NO. 3:** Describe any damage or injury to YOUR business or reputation as
5 a result of any of the statements identified in response to Interrogatory No. 1 and describe the
6 factual basis for said injury or damage and IDENTIFY every individual with factual knowledge to
7 support said alleged damage or injury.

8 **ANSWER:**

9 ULC Monastery objects to this interrogatory as not reasonably calculated to lead to the
10 discovery of admissible evidence, because ULC Monastery is neither alleging nor requesting
11 damages based upon injury to its reputation or alleged business, and because injury is presumed
12 as a matter of law. Without waiving and subject to all objections, ULC Monastery answers that it
13 has been injured by its effort spent investigating to determine the author and publisher of both The
14 AMM-vs.-ULC Website and The AMM Legal Website, and investigating and verifying that the
15 statements made were inaccurate, misleading, unfair, deceptive, and/or false; having to stop and
16 rectify such acts and practices and bring this action; and inconvenience.

17
18 **INTERROGATORY NO. 4:** IDENTIFY each PERSON with knowledge of how any of ULC's
19 officer's personal reputations have affected ULC's business reputation and describe how such
20 personal reputations have affected ULC.

21 **ANSWER:**

22 Objection, this Interrogatory is vague and ULC Monastery is not certain what is being
23 requested. ULC Monastery further objects that this Interrogatory is not relevant to any party's
24 claim or defense, and is not proportional to the needs of the case, considering the importance of
25 the issues at stake in the action, the amount in controversy, the parties' relative access to relevant
26

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1 information, the parties' resources, the importance of the discovery in resolving the issues, and
2 whether the burden or expense of the proposed discovery outweighs its likely benefit.

3 ULC Monastery further objects as to overbroad as to time, as no time frame is given.

4 However, without waiving and subject to all objections, as ULC Monastery understands
5 the Interrogatory, ULC Monastery answers that its reputation as a religious organization has not
6 been affected by "any of ULC's officer's personal reputations."

7 Those with knowledge may include the following Officers and Directors, all of which can
8 be contacted through counsel: Matthew Pasco; George Freeman; Bruce Taylor; Calvin Toellner;
9 Saul Groman; Dallas Goschie; and Alexander Kostrinsky-Thomas.

10
11 **INTERROGATORY NO. 5:** IDENTIFY all examples of which YOU are aware in which ULC
12 was mistaken for the UNIVERSAL LIFE CHURCH and vice versa. Or in which someone was
13 confused about the relationship between ULC and the UNIVERSAL LIFE CHURCH.

14 **ANSWER:**

15 ULC Monastery objects to this interrogatory as vague and ambiguous to the extent it relies
16 on the vaguely-defined terms "ULC" and "UNIVERSAL LIFE CHURCH." ULC Monastery is
17 an organization inspired by the Universal Life Church founded by Kirby Hensley, and is separate
18 and distinct from the California ULC. Without waiving and subject to all objections, ULC
19 Monastery answers that it is aware of the following instances that may demonstrate confusion
20 (intentional or otherwise) regarding the relationship between ULC Monastery, the California ULC,
21 and the Universal Life Church as a broad spiritual movement:

22 (1) Defendant AMM through The AMM-vs-ULC Website and The AMM Legal
23 Website;

24 (2) Clark County, NV and its Clerk may have had some confusion, but ULC Monastery
25 is unaware of any specific confusion;

26
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1 (3) ULC Monastery has sometimes received messages or emails or calls inquiring
 2 about the California ULC, or where, from the substance of the message, it appears
 3 the sender may initially believe she/he is contacting the California ULC. See the
 4 messages produced in response to this Interrogatory.

5
 6 **INTERROGATORY NO. 6:** Describe the efforts taken by YOU and/or George Freeman to
 7 differentiate ULC from the UNIVERSAL LIFE CHURCH.

8 **ANSWER:**

9 Object to the inclusion of George Freeman, who is not a party to this lawsuit. ULC
 10 Monastery objects to this interrogatory as vague and ambiguous to the extent it relies on the
 11 vaguely-defined terms “ULC” and “UNIVERSAL LIFE CHURCH.” ULC Monastery is an entity
 12 inspired by the Universal Life Church founded by Kirby Hensley, and is separate and distinct from
 13 the California ULC.

14 Subject to and without all objections, ULC Monastery states on its website that while it is
 15 a “direct descendant of the original Universal Life Church founded by the controversial Kirby
 16 Hensley in the late 1950s,” ULC Monastery “has discarded the deceptive and illegal practices of
 17 the old Modesto ULC and it has since proudly assumed the leadership mantle of that institution
 18 and improved upon its design...”

19 ULC Monastery operates and publishes the content on the website at universal-life-
 20 church.com to provide information about and the differentiation of the entities. In addition, when
 21 receiving messages and calls where the sender or caller may initially believe she or he is contacting
 22 the California ULC, ULC Monastery has stated that it is separate and distinct from the California
 23 ULC. See documents in response to Interrogatory no. 5.

1 **INTERROGATORY NO. 7:** IDENTIFY every domain, website, or webpage owned, licensed,
2 operated, or controlled by YOU and how long YOU have owned, licensed, operated, or controlled
3 the domain, website, or webpage.

4 **ANSWER:**

5 ULC Monastery admits it owns the domains identified in Defendant's Answer and
6 Counterclaims: (1) getordained.org/training/american-marriage; (2) ulc.org/training/American-
7 marriage; and (3) americanmarriageministries.com. ULC Monastery further admits it posted and
8 controls the content on the websites at such domains.

9
10 ULC Monastery objects as to the identification of every other domain and website as not
11 relevant to any party's claim or defense, and is not proportional to the needs of the case, considering
12 the importance of the issues at stake in the action, the amount in controversy, the parties' relative
13 access to relevant information, the parties' resources, the importance of the discovery in resolving
14 the issues, and whether the burden or expense of the proposed discovery outweighs its likely
15 benefit.

16
17 **INTERROGATORY NO. 8:** IDENTIFY all PERSONS involved in developing, drafting,
18 approving, or publishing the content of the domains, websites, or webpages identified in response
19 to Interrogatory No. 7, and describe each PERSON'S role and responsibilities with respect to the
20 content of these domains, websites, or webpages.

21 **ANSWER:**

22 ULC Monastery re-asserts and incorporates herein its objections stated in the Answer to
23 Interrogatory no. 7.

24 Without waiving and subject to all objections, as to the websites identified in response to
25 Interrogatory no. 7:
26

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1. Dallas Goschie – management, oversight, suggestions as to content, look, and format;
2. George Freeman -- management, oversight, suggestions as to content, look, and format;
3. Brian Wozeniak – set-up, technical aspects, and suggestions as to content, look, and format
4. Jeremy Brant – set-up, technical aspects, and suggestions as to content, look, and format

See the documents produced in response to this Interrogatory.

INTERROGATORY NO. 9: Describe the circumstances behind every modification to the content of the webpages available at <https://getordained.org/training/american-marriage>, <https://ulc.org/training/american-marriage>, and <https://www.americanmarriageministries.com> since January 1, 2009, including how often modifications were made, when modifications were made, what modifications were made, and why modifications were made to the content of these webpages.

ANSWER:

ULC Monastery objects to this interrogatory as overbroad as to time frame; seeking any and all “modifications” for a period of time in excess of 10 years is not relevant to any party's claim or defense, and is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties’ relative access to relevant information, the parties’ resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

ULC Monastery also objects as unduly burdensome to the extent the interrogatory calls for information already in the possession, custody, or control of AMM or is at least as easy for AMM to obtain as ULC Monastery.

Without waiving and subject to the Court first ruling on all objections, ULC Monastery published content on the three web pages, but is unable to describe the circumstances behind every

1 modification of such content.

2 ULC Monastery began making content available at “americanmarriageministries.com”
 3 around spring 2014. Later in that year (2014), the site stated that AMM ordinations were “legally
 4 invalid,” but in early 2015, the phrase “legally invalid” was removed, and the website stated
 5 “AMM ordinations *may* not be considered legally valid.” Around late spring to early summer
 6 2019, the content on the site changed to its current version.
 7

8
 9 **INTERROGATORY NO. 10:** IDENTIFY every website owned by YOU that has contained any
 10 statement RELATED TO AMM, IDENTIFY every statement made RELATED TO AMM, and
 11 describe the factual support for any such statement, including, but not limited to, any statement
 12 that marriages performed by an AMM-licensed officiant may not be valid.

13 **ANSWER:**

14 ULC Monastery objects to this interrogatory as vague in its use of the term “related to.”
 15 ULC Monastery objects to this interrogatory as overbroad, unduly burdensome, considering the
 16 needs of the case, as to identifying in this Answer each and every statement, considering that the
 17 statements are publicly available and equally accessible to the parties, and the vaguely defined
 18 term “related to” and the defined term “AMM” are unduly broad.

19 Without waiving and subject to all objections, ULC Monastery identifies
 20 <https://www.americanmarriageministries.com/>. The “americanmarriageministries” website
 21 identifies and quotes the legal opinion and decision of then Senior Judge Curtis E. von Kann,
 22 which is the basis of the statements on the website. The Court for the District of Columbia
 23 concluded that Defendant AMM does not “subscribe to some theological doctrine or moral
 24 principle,” and as such its minister was precluded under the District of Columbia statute from
 25 legally officiating and solemnizing the marriage.
 26

1
2 **INTERROGATORY NO. 11:** IDENTIFY the date and describe the details of ULC's first use of
3 "American marriage ministries" on its websites or in connection with its services, including the
4 identity of all PERSONS involved, why it was used, and all DOCUMENTS RELATED TO the
5 usage.

6 **ANSWER:**

7 ULC Monastery objects to this interrogatory as vague and ambiguous as to whether it
8 seeks information regarding use of "American marriage ministries" in the exact capitalization
9 and spacing provided and uses the vaguely defined term "related to," as unduly broad and
10 unreasonably burdensome to the extent it seeks identification of all documents "related to"
11 identified usage, and to the extent it calls for information subject to attorney-client privilege
12 and/or work product immunity.

13 Without waiving and subject to all objections, ULC Monastery obtained control of the
14 domain americanmarriageministries.com on July 27, 2011. It believes it began hosting a website
15 on the domain around spring 2014, but is not certain when it first used the words "American
16 marriage ministries" in the content of such site.

17 Persons with some related knowledge may include Dallas Goschie, George Freeman, and
18 Brian Wozeniak. Jeremy Brant and Jeff Vogt may also have some knowledge. GoDaddy would
19 also likely have information. GoDaddy, 14455 N Hayden Rd Ste 219, Scottsdale, AZ 85260. (480)
20 505-8800.

21 Please see the documents produced in response to this Interrogatory. ULC Monastery
22 objects to identifying each and every individual document as unduly burdensome, and where the
23 parties' relative access and resources are equal in regard to identification.
24
25
26

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1 **INTERROGATORY NO. 12:** Describe any instances of which ULC, or its employees, are aware
2 when anyone has inquired about whether there is an association or other connection between
3 ULC's goods or services and AMM's goods or services.

4 **ANSWER:**

5 The only potentially responsive inquires of which ULC Monastery is aware are in the
6 documents provided in response to this Interrogatory.

7
8 **INTERROGATORY NO. 13:** Describe any instances of which ULC or its employees are aware
9 when anyone has inquired about whether there is an association or other connection between
10 ULC's goods or services and the UNIVERSAL LIFE CHURCH's goods or services.

11 **ANSWER:**

12 ULC Monastery objects to this interrogatory as vague and ambiguous to the extent it relies
13 on the vaguely-defined terms "ULC" and "UNIVERSAL LIFE CHURCH." ULC Monastery is
14 an entity inspired by the Universal Life Church founded by Kirby Hensley, although it is separate
15 and distinct from the California ULC. Without waiving and subject to all objections, ULC
16 Monastery has occasionally received messages or emails or calls inquiring about the California
17 ULC, or where, from the substance of the message, it appears the sender may initially believe
18 she/he is contacting the California ULC. See the messages produced in response to Interrogatory
19 no. 5.

20
21 **INTERROGATORY NO. 14:** IDENTIFY the number of visitors to the webpages available at
22 <https://getordained.org/training/american-marriage>, <https://ulc.org/training/american-marriage>,
23 and <https://www.americanmarriageministries.com> per month since 2009.

24 **ANSWER:**

25 ULC Monastery objects to this interrogatory as unduly broad and not reasonably calculated
26

1 to lead to the discovery of admissible evidence, and unduly burdensome to the extent it seeks trade
 2 secrets and confidential information. Without waiving and subject to all objections, please see the
 3 Google analytics reports provided in response to this Interrogatory.

4
 5 **INTERROGATORY NO. 15:** IDENTIFY and describe the gross revenues, projected gross
 6 revenues, and profits of ULC and all ULC affiliates or related companies due to sales of its goods
 7 and services.

8 **ANSWER:**

9 ULC Monastery objects to this Interrogatory as not relevant to any party's claim or defense,
 10 and is not proportional to the needs of the case, considering the importance of the issues at stake
 11 in the action, the amount in controversy, the parties' relative access to relevant information, the
 12 parties' resources, the importance of the discovery in resolving the issues, and whether the burden
 13 or expense of the proposed discovery outweighs its likely benefit, and to the extent it seeks trade
 14 secret, sensitive, proprietary or confidential information.

15
 16 ULC Monastery further objects to this interrogatory as vague and ambiguous to the extent
 17 it uses the vaguely-defined term "ULC" as well as "affiliates" and "related companies."

18 ULC Monastery further objects as to overbroad as to time, as no time frame is given, and
 19 seeking such information for a period of over 13 years is equally not relevant for the same reasons
 20 stated above.

21
 22 Without waiving and subject to all objections, please see the Answer to Interrogatory no.
 23 3, and the Google analytics reports provided in response to Interrogatory no. 14, which show the
 24 sales, if any, derived from the webpages which Defendant AMM identifies and complains about
 25 in its Answer and Counterclaims.

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1
2 **INTERROGATORY NO. 16:** IDENTIFY all surveys, polls, studies, research, DOCUMENTS,
3 or COMMUNICATIONS concerning the issues of whether “American marriage ministries” is
4 generic or descriptive, whether “American marriage ministries” is distinctive, or whether there is
5 a likelihood of confusion between ULC’s use of “American marriage ministries” and AMM’s use
6 of “American marriage ministries.”

7 **ANSWER:**

8 ULC Monastery objects to the extent this interrogatory seeks information covered by
9 attorney-client privilege and/or work product immunity, seeks expert disclosure material outside
10 the scope, time, or manner set forth in Fed. R. Civ. P. 26(a)(2), local court rules, and/or the orders
11 of the court, and seeks material relevant only to matters the parties have agreed to address in a
12 related administrative matter. ULC Monastery also objects to this interrogatory as vague and
13 ambiguous as to whether it seeks information regarding use of “American marriage ministries” in
14 the exact capitalization and spacing provided. Subject to and without waiving all objections, ULC
15 Monastery is not aware of any non-privileged responsive documents concerning whether there is
16 a likelihood of confusion between ULC Monastery’s use of “American marriage ministries” and
17 AMM’s alleged use of “American marriage ministries.”

18
19 **INTERROGATORY NO. 17:** IDENTIFY every instance of any party other than AMM using the
20 phrase “American marriage ministries,” when such phrase was used, and describe why the phrase
21 was used, including whether that use was to act as a source identifier of goods or services.

22 **ANSWER:**

23 ULC Monastery also objects to this interrogatory as vague and ambiguous as to whether it
24 seeks information regarding use of “American marriage ministries” in the exact capitalization and
25 spacing provided, and to the extent it seeks information outside ULC Monastery’s possession,
26

1 custody, or control. Without waiving and subject to all objections, with regard to ULC Monastery's
 2 use of "American marriage ministries," see the response to Interrogatory No. 9. With regard to
 3 third-party uses, please see documents provided in response.

4
 5 **INTERROGATORY NO. 18:** IDENTIFY any and all allegations of improper or illegal conduct
 6 you have threatened or communicated to any other party regarding any Defendant, and IDENTIFY
 7 the third party to whom you communicated such allegation.

8 **ANSWER:**

9 ULC Monastery objects as to overbroad as to time as no time frame is given, and seeking
 10 such information for a period of over 13 years is not relevant to any party's claim or defense, and
 11 is not proportional to the needs of the case, considering the importance of the issues at stake in the
 12 action, the amount in controversy, the parties' relative access to relevant information, the parties'
 13 resources, the importance of the discovery in resolving the issues, and whether the burden or
 14 expense of the proposed discovery outweighs its likely benefit.

15
 16 Information responsive may include the proceedings before Trademark Trial and Appeals
 17 Board:

18 1. *Universal Life Church Monastery Storehouse v. American Marriage*
 19 *Ministries*, TTAB, Cancellation no. 92069411.

20 2. *American Marriage Ministries v. Universal Life Church Monastery*
 21 *Storehouse*, TTAB, Opposition no. 91237315.

22 3. Myron King, brother to Defendants Lewis King and Maurice King, was
 23 getting married, which was to be officiated by an AMM minister. In promotion of that wedding
 24 by an AMM minister, Defendants AMM, Maurice King, and/or Lewis King utilized an image
 25 of George Freeman without permission or consent. ULC Monastery, through Mr. Freeman,
 26 requested such Defendants remove the image.

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INSTRUCTIONS FOR REQUESTS FOR PRODUCTION

If you do not have possession, custody, or control of any documents described in any one or more of the following Requests, a written statement that you do not have possession, custody, or control of any such documents and the name and address of the person who does have possession, custody, or control of such documents is a sufficient response to the request. However, production of such documents shall be required if you or any of your agents, employees, servants, or representatives have possession, custody, or control of the same. Unless the request specifically directs production of the originals of the documents, delivery of an accurate, legible, and complete photocopy of the documents requested to the attorney is a sufficient response to the request.

Documents produced shall be organized and designated to correspond to the categories in the request or produced as they are kept in the usual course of business.

AMM further requests that:

If any requested document or other thing is no longer in your possession, custody, or control, state whether it was lost, destroyed or otherwise disposed of and describe the circumstances of such disposition;

If you contend that any requested document is privileged and, therefore, not subject to production, identify the document in your written response by describing the document sufficiently to allow AMM to move the court to compel its disclosure. The description should include, but not be limited to, the following information:

1. The name of the person who prepared the document;
2. The name of each person to whom the document was addressed and/or distributed;
3. The date of the document;
4. The description of the general nature of the document;
5. The specific privilege(s) which you contend applies to the document;
6. The ground upon which you rely to establish the privilege as to the document.

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1 If you contend that any portion of any requested document is privileged and, therefore, not
2 subject to production, identify and produce any non-privileged portions for each such document.

3 If you object to the production of any document on any ground(s), such objection(s) must
4 be fully and specifically stated, including the ground(s) therefor.

5 You are to divulge all information and documents which are in your possession, custody,
6 or control or which can be ascertained upon reasonable investigation of areas within your control.
7 The knowledge of your attorney is deemed to be your knowledge so that, apart from privileged
8 matters, if your attorney has knowledge of the information sought to be elicited herein, said
9 knowledge must be incorporated into these answers even if such information is unknown to you
10 individually.

11
12 **REQUESTS FOR PRODUCTION**

13 **REQUEST FOR PRODUCTION NO. 1:** DOCUMENTS relied on or consulted in forming the
14 answer to any Interrogatory proffered to ULC.

15 **RESPONSE:**

16 To the extent this Request seeks any documents which are privileged or otherwise protected
17 material, General Objection no. 5 is specifically asserted here and incorporated herein. ULC
18 Monastery also incorporates and asserts its objections to each individual interrogatory covered by
19 this request. Without waiving and subject to the Court first ruling on all objections, any other
20 documents responsive to this Request are being produced.

21
22 **REQUEST FOR PRODUCTION NO. 2:** DOCUMENTS sufficient to show YOUR legal entity
23 structure and IDENTIFY all YOUR owners, directors, managers, and officers.

24 **RESPONSE:**

25 Documents responsive to this Request are being produced.
26

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1
2 **REQUEST FOR PRODUCTION NO. 3:** DOCUMENTS sufficient to show any corporate
3 entities related to YOU and to IDENTIFY all owners, directors, managers, and officers of said
4 related entities.

5 **RESPONSE:**

6 ULC Monastery objects as not relevant to any party's claim or defense, and is not
7 proportional to the needs of the case, considering the importance of the issues at stake in the action,
8 the amount in controversy, the parties' relative access to relevant information, the parties'
9 resources, the importance of the discovery in resolving the issues, and whether the burden or
10 expense of the proposed discovery outweighs its likely benefit. ULC Monastery also objects to
11 this request as vague to the extent it is not clear what circumstances or characteristics would make
12 an entity sufficiently "related" to be responsive.

13 However, subject to all objections and without waiving any objection, see the documents
14 produced in response to these Requests.

15
16 **REQUEST FOR PRODUCTION NO. 4:** DOCUMENTS sufficient to show YOUR assets and
17 liabilities.

18 **RESPONSE:**

19 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
20 is not proportional to the needs of the case, considering the importance of the issues at stake in the
21 action, the amount in controversy, the parties' relative access to relevant information, the parties'
22 resources, the importance of the discovery in resolving the issues, and whether the burden or
23 expense of the proposed discovery outweighs its likely benefit.

24 ULC Monastery further objects to this Request as overbroad as to time, as no time frame
25 is given, and seeking such information for a period of over 13 years is equally not relevant for the
26

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1 same reasons stated above.

2 Without waiving and subject to objections, please see the Answer to Interrogatory no. 3,
3 and the Google analytics reports provided in response to Interrogatory no. 14, which show the
4 sales, if any, derived from the three webpages which Defendant AMM identifies and complains
5 about in its Answer and Counterclaims.
6

7
8 **REQUEST FOR PRODUCTION NO. 5:** DOCUMENTS sufficient to show assets and liabilities
9 of any corporate entities related to YOU.

10 **RESPONSE:**

11 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
12 is not proportional to the needs of the case, considering the importance of the issues at stake in the
13 action, the amount in controversy, the parties' relative access to relevant information, the parties'
14 resources, the importance of the discovery in resolving the issues, and whether the burden or
15 expense of the proposed discovery outweighs its likely benefit.

16 ULC Monastery further objects as to overbroad as to time, as no time frame is given, and
17 seeking such information for a period of over 13 years is equally not relevant for the same reasons
18 stated above.
19

20 ULC Monastery further objects to any Documents which are not in the possession, custody,
21 or control of ULC Monastery.

22 ULC Monastery also objects to this request as vague to the extent it is not clear what
23 circumstances or characteristics would make an entity sufficiently "related" to be responsive.

24 Without waiving and subject to all objections, please see the Answer to Interrogatory no.
25 3, and the Google analytics reports provided in response to Interrogatory no. 14, which show the
26

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1 sales, if any, derived from the webpages which Defendant AMM identifies and complains about
2 in its Answer and Counterclaims.

3
4 **REQUEST FOR PRODUCTION NO. 6:** DOCUMENTS RELATED TO YOUR development,
5 drafting, or publication of, or decision to publish, the content of:

6 * the webpage available at: <https://getordained.org/training/american-marriage>;

7 * the webpage available at: <https://ulc.org/training/american-marriage>;

8 * the webpage available at <https://www.americanmarriageministries.com>;

9 and any other webpage containing content using the words “American marriage ministry” or
10 “American marriage ministries.”

11 **RESPONSE:**

12 ULC Monastery objects as to the time and breadth of this Request. Seeking Documents
13 for an indefinite period of time is not relevant to any party's claim or defense, and is not
14 proportional to the needs of the case, considering the importance of the issues at stake in the action,
15 the amount in controversy, the parties’ relative access to relevant information, the parties’
16 resources, the importance of the discovery in resolving the issues, and whether the burden or
17 expense of the proposed discovery outweighs its likely benefit.

18 ULC Monastery further objects to use of the term “related to” as vague, and that such usage
19 makes this request overly broad, unduly burdensome, and not reasonably calculated to lead to the
20 discovery of admissible evidence.

21 ULC Monastery also objects to the extent this request seeks documents covered by
22 attorney-client privilege and/or work product immunity.

23 Without waiving and subject to the Court first ruling on all objections, non-privileged
24 documents responsive to this Request which ULC Monastery could locate are being produced,
25 including those in response to Interrogatory no. 9.

26
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REQUEST FOR PRODUCTION NO. 7: DOCUMENTS sufficient to show the content of:

- * the webpage available at <https://getordained.org/training/american-marriage>;
- * the webpage available at <https://ulc.org/training/american-marriage>;
- * the webpage available at <https://www.americanmarriageministries.com>;
- * and any other webpage containing content using the words “American marriage ministry” or “American marriage ministries”;

from 2009 to the present.

RESPONSE:

ULC Monastery objects as to the time and breadth of this Request. Seeking Documents for a period of time in excess of 10 years is not relevant to any party's claim or defense, and is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. ULC Monastery also objects to the extent this request seeks documents that are outside ULC Monastery's possession, custody, or control, and as easily available to AMM.

Without waiving and subject to the Court first ruling on all objections, documents responsive to this Request which ULC Monastery could locate are being produced, including those in response to Interrogatory no. 9.

REQUEST FOR PRODUCTION NO. 8: DOCUMENTS RELATED TO the domain [americanmarriageministries.com](https://www.americanmarriageministries.com) including all DOCUMENTS showing what information was provided to the domain name registrar.

RESPONSE:

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1 ULC Monastery objects to this request as vague, as well as overly broad, unduly
 2 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and
 3 disproportional to the needs of the case, to the extent it seeks all documents “related to” to the
 4 americanmarriageministries.com domain name. Subject to and without waiving these objections,
 5 non-privileged Documents responsive to this Request which ULC Monastery could locate are
 6 being produced, including those produced in response to Interrogatory no. 9 and Request for
 7 Production no. 7.

8
 9 **REQUEST FOR PRODUCTION NO. 9:** DOCUMENTS sufficient to show the content of the
 10 domain americanmarriageministries.com from the date of YOUR acquisition of said domain to the
 11 present.

12 **RESPONSE:**

13 ULC Monastery objects to this request as overly broad, unduly burdensome, not reasonably
 14 calculated to lead to the discovery of admissible evidence, and disproportional to the needs of the
 15 case to the extent it seeks documents dating back to ULC Monastery’s acquisition of the domain
 16 name. Subject to and without waiving all objections, Documents responsive to this Request which
 17 ULC Monastery could locate are being produced, including those produced in response to
 18 Interrogatory no. 9 and Request for Production no. 7.

19
 20 **REQUEST FOR PRODUCTION NO. 10:** DOCUMENTS RELATED TO YOUR decision to
 21 acquire the domain americanmarriageministries.com.

22 **RESPONSE:**

23 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
 24 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
 25 the needs of the case to the extent it seeks all documents “related to” the subject matter. Documents
 26

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1 responsive to this Request which ULC Monastery could locate are being produced, including those
2 produced in response to Interrogatory no. 9 and Request for Production no. 7.

3
4 **REQUEST FOR PRODUCTION NO. 11:** DOCUMENTS RELATED TO YOUR knowledge
5 of the prior ownership of the domain americanmarriageministries.com.

6 **RESPONSE:**

7 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
8 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
9 the needs of the case to the extent it seeks all documents “related to” the subject matter, and vague
10 with regard to use of the term “ownership.” Without waiving and subject to all objections,
11 Documents responsive to this Request which ULC Monastery could locate are being produced,
12 including those produced in response to Interrogatory no. 9, and Requests for Production nos. 7
13 and 30.

14
15 **REQUEST FOR PRODUCTION NO. 12:** DOCUMENTS RELATED TO YOUR use of the
16 phrase “American marriage ministries.”

17 **RESPONSE:**

18 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
19 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
20 the needs of the case, to the extent it seeks all documents “related to” the subject matter, and vague
21 to the extent it is not clear whether it covers only the specified capitalization, spacing, and format
22 of “American marriage ministries.” ULC Monastery further objects to the extent this request seeks
23 documents covered by attorney-client privilege and/or work product immunity. Subject to and
24 without waiving the foregoing objections, non-privileged documents responsive to this Request
25 which ULC Monastery could locate are being produced, which may include those produced in
26

1 response to Interrogatory no. 9, and Requests for Production nos. 7 and 30.

2
3 **REQUEST FOR PRODUCTION NO. 13:** DOCUMENTS RELATED TO any use of the phrase
4 “American marriage ministries” by a party other than AMM and YOU.

5 **RESPONSE:**

6 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
7 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
8 the needs of the case, to the extent it seeks all documents “related to” the subject matter, and vague
9 to the extent it is not clear whether it covers only the specified capitalization, spacing, and format
10 of “American marriage ministries.” Subject to and without waiving the foregoing objections,
11 non-privileged responsive documents are being produced.

12
13 **REQUEST FOR PRODUCTION NO. 14:** DOCUMENTS sufficient to show the number of
14 visitors to the webpages available at <https://getordained.org/training/american-marriage>,
15 <https://ulc.org/training/american-marriage>, and <https://www.americanmarriageministries.com>, the
16 average time each visitor spends on the webpage in question, the call-to-action click-through rate,
17 and the conversion rate.

18 **RESPONSE:**

19 Please see the Google analytics reports produced in response to Interrogatory no. 14.

20
21 **REQUEST FOR PRODUCTION NO. 15:** DOCUMENTS sufficient to show YOUR
22 relationship, if any, with any other organization or entity bearing the name “Universal Life
23 Church” or “ULC” as all or part of its name.

24 **RESPONSE:**

25 Please see the documents produced in response to these Requests.

26
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REQUEST FOR PRODUCTION NO. 16: DOCUMENTS RELATED TO AMM or any board member or employee of AMM.

RESPONSE:

ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to the needs of the case to the extent it seeks all documents “related to” the broadly defined term “AMM,” and encompasses documents protected by the work product doctrine and attorney-client privilege. ULC Monastery and AMM are parties to two proceedings before the Trademark Trial and Appeals Board in addition to this case.

However, without waving and subject to all objections, please see the documents produced in response to these Requests, including those in response to Request for Production no. 30.

REQUEST FOR PRODUCTION NO. 17: DOCUMENTS RELATED TO any analysis of competition between YOU and AMM.

RESPONSE:

ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to the needs of the case, to the extent it seeks all documents “related to” the subject matter. ULC Monastery is unaware of any specific, non-privileged, responsive documents, however the documents produced in response to these requests may be responsive.

REQUEST FOR PRODUCTION NO. 18: DOCUMENTS RELATED TO any analysis of competition in YOUR industry or the online ordination industry.

RESPONSE:

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1 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
 2 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
 3 the needs of the case, to the extent it seeks all documents "related to" the subject matter. Without
 4 waiving and subject to all objections, any non-privileged responsive documents are being produced
 5 in response to these Requests.

6
 7 **REQUEST FOR PRODUCTION NO. 19:** DOCUMENTS RELATED TO any analysis of
 8 YOUR reputation in YOUR industry.

9 **RESPONSE:**

10 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
 11 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
 12 the needs of the case, to the extent it seeks all documents "related to" the subject matter." Without
 13 waiving such objections, any responsive documents are being produced in response to these
 14 Requests.

15
 16 **REQUEST FOR PRODUCTION NO. 20:** DOCUMENTS RELATED TO marriage laws in the
 17 District of Columbia.

18 **RESPONSE:**

19 ULC Monastery objects to this request as vague, and as overly broad, unduly burdensome,
 20 not reasonably calculated to lead to the discovery of admissible evidence, and disproportional to
 21 the needs of the case, to the extent it seeks all documents "related to" the subject matter, and to the
 22 extent it seeks documents as easily available to AMM. ULC Monastery further objects to the
 23 extent this request seeks documents covered by attorney-client privilege and/or work product
 24 immunity. Without waiving and subject to all objections, any non-privileged responsive
 25 documents are being produced in response to these Requests.

26
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1
2 **REQUEST FOR PRODUCTION NO. 21:** DOCUMENTS RELATED TO YOUR reputation in
3 the industry and to the public at large.

4 **RESPONSE:**

5 ULC Monastery objects to this request as vague, and as overly broad, unduly
6 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and
7 disproportional to the needs of the case, to the extent it seeks all documents “related to” the
8 subject matter. Without waiving and subject to all objections, any responsive documents are
9 being produced in response to these Requests.
10

11
12 **REQUEST FOR PRODUCTION NO. 22:** DOCUMENTS RELATED TO YOUR relationship
13 with George Freeman.

14 **RESPONSE:**

15 ULC Monastery objects to this Request as vague in its use of the term “related to,” and not
16 relevant to any party’s claim or defense, and not proportional to the needs of the case, considering
17 the importance of the issues at stake in the action, the amount in controversy, the parties’ relative
18 access to relevant information, the parties’ resources, the importance of the discovery in resolving
19 the issues, and whether the burden or expense of the proposed discovery outweighs its likely
20 benefit. Moreover, Mr. Freeman is not a party, and no claims are asserted as against him. ULC
21 Monastery also objects to the extent this request seeks documents covered by attorney-client
22 privilege and/or work product immunity.
23

24 **REQUEST FOR PRODUCTION NO. 23:** DOCUMENTS showing the relationship between all
25 businesses ever operated by George Freeman and the Universal Life Church.

26 **RESPONSE:**

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1 ULC Monastery objects to this Request as overly broad, unduly burdensome, not relevant
 2 to any party's claim or defense, and not proportional to the needs of the case, considering the
 3 importance of the issues at stake in the action, the amount in controversy, the parties' relative
 4 access to relevant information, the parties' resources, the importance of the discovery in resolving
 5 the issues, and whether the burden or expense of the proposed discovery outweighs its likely
 6 benefit. Moreover, Mr. Freeman is not a party, and no claims are asserted as against him. ULC
 7 Monastery also objects to this request as vague and ambiguous in its use of "Universal Life
 8 Church."

9
 10 **REQUEST FOR PRODUCTION NO. 24:** DOCUMENTS showing when and why George
 11 Freeman's relationship with the Universal Life Church ended.

12 **RESPONSE:**

13 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
 14 is not proportional to the needs of the case, considering the importance of the issues at stake in the
 15 action, the amount in controversy, the parties' relative access to relevant information, the parties'
 16 resources, the importance of the discovery in resolving the issues, and whether the burden or
 17 expense of the proposed discovery outweighs its likely benefit. Moreover, Mr. Freeman is not a
 18 party, and no claims are asserted as against him. ULC Monastery also objects to this request as
 19 vague and ambiguous in its use of "Universal Life Church."

20
 21 **REQUEST FOR PRODUCTION NO. 25:** DOCUMENTS RELATED TO the criminal history
 22 of George Freeman or YOUR knowledge of said criminal history.

23 **RESPONSE:**

24 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
 25 is not proportional to the needs of the case, considering the importance of the issues at stake in the
 26

1 action, the amount in controversy, the parties' relative access to relevant information, the parties'
 2 resources, the importance of the discovery in resolving the issues, and whether the burden or
 3 expense of the proposed discovery outweighs its likely benefit. Moreover, Mr. Freeman is not a
 4 party, and no claims are asserted as against him. ULC Monastery also objects to this request as
 5 vague and overly broad in its use of "related to."

6 In addition, this Request is not calculated to lead to the discovery of admissible evidence,
 7 as FRE 609 and 403-404 generally preclude evidence of a crime (and none on behalf of Mr.
 8 Freeman is implied or admitted).

9
 10 **REQUEST FOR PRODUCTION NO. 26:** DOCUMENTS RELATED TO YOUR relationship
 11 to the former business establishment named "The Monastery."

12 **RESPONSE:**

13 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
 14 is not proportional to the needs of the case, considering the importance of the issues at stake in the
 15 action, the amount in controversy, the parties' relative access to relevant information, the parties'
 16 resources, the importance of the discovery in resolving the issues, and whether the burden or
 17 expense of the proposed discovery outweighs its likely benefit. Moreover, any other business or
 18 entity is not a party to this action, and no claims are brought by or against any other business or
 19 entity. ULC Monastery also objects to this request as vague and overly broad in its use of "related
 20 to" and "the former business establishment named 'The Monastery.'" ULC Monastery also objects
 21 to the extent this request seeks documents covered by attorney-client privilege or work product
 22 immunity.

23
 24 **REQUEST FOR PRODUCTION NO. 27:** DOCUMENTS RELATED TO criminal or civil
 25 violations related to the former business establishment named "The Monastery" or YOUR
 26

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1 knowledge of the same.

2 **RESPONSE:**

3 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
4 is not proportional to the needs of the case, considering the importance of the issues at stake in the
5 action, the amount in controversy, the parties' relative access to relevant information, the parties'
6 resources, the importance of the discovery in resolving the issues, and whether the burden or
7 expense of the proposed discovery outweighs its likely benefit.

8 In addition, this Request is not calculated to lead to the discovery of admissible evidence,
9 as FRE 609 and 403-404 generally preclude evidence of a crime (and none on behalf of any
10 business or entity is implied or admitted).

11 ULC Monastery also objects to this request as vague and overly broad in its use of "related
12 to" and "the former business establishment named 'The Monastery.'" ULC Monastery also objects
13 to the extent this request seeks documents covered by attorney-client privilege or work product
14 immunity.

15
16 **REQUEST FOR PRODUCTION NO. 28:** DOCUMENTS RELATED TO any criminal or civil
17 violations alleged against YOU.

18 **RESPONSE:**

19 ULC Monastery objects to the definition of "YOU" as the inclusion of any person or entity
20 other than Plaintiff ULC Monastery is overbroad, not relevant to any party's claim or defense, and
21 is not proportional to the needs of the case, considering the importance of the issues at stake in the
22 action, the amount in controversy, the parties' relative access to relevant information, the parties'
23 resources, the importance of the discovery in resolving the issues, and whether the burden or
24 expense of the proposed discovery outweighs its likely benefit.

25 In addition, this Request is not calculated to lead to the discovery of admissible evidence,
26

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1 as FRE 609 and 403-404 generally preclude evidence of a crime (and none by ULC Monastery is
2 implied or admitted).

3 ULC Monastery also objects to this request as vague and overly broad in its use of “related
4 to.” ULC Monastery also objects to the extent this request seeks documents covered by attorney-
5 client privilege or work product immunity.

6 Without waiving such objections, non-privileged documents showing any criminal or civil
7 violations alleged against Plaintiff ULC Monastery, if any, within the possession, custody or
8 control of Plaintiff are being produced.

9
10 **REQUEST FOR PRODUCTION NO. 29:** DOCUMENTS sufficient to show all legal action
11 including lawsuits, letters, or any correspondence taken by YOU against any competitor other than
12 AMM.

13 **RESPONSE:**

14 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
15 is not proportional to the needs of the case, considering the importance of the issues at stake in the
16 action, the amount in controversy, the parties' relative access to relevant information, the parties'
17 resources, the importance of the discovery in resolving the issues, and whether the burden or
18 expense of the proposed discovery outweighs its likely benefit.

19 ULC Monastery also objects to this request as vague and and ambiguous in its use of
20 “competitor.” ULC Monastery also objects to the extent this request seeks documents covered by
21 attorney-client privilege or work product immunity.

22 However, without waiving and subject to all objections, the actions and proceedings to
23 which ULC Monastery has been a party are listed in the Response to Request for Production no.
24 33.

25
26
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1 **REQUEST FOR PRODUCTION NO. 30:** DOCUMENTS RELATED TO the relationship
2 between YOU and any Defendant, including, but not limited to, Defendants Maurice King, Lewis
3 King, Glen Yoshioka, and Dylan Wall including, but not limited to, any contracts and/or
4 agreements.

5 **RESPONSE:**

6 ULC Monastery objects to this request as vague and overly broad, unduly burdensome, and
7 not reasonably calculated to lead to the discovery of admissible evidence, in its use of “related to.”
8 Without waiving and subject objections, please see the documents produced in response to this
9 Request.

10
11 **REQUEST FOR PRODUCTION NO. 31:** DOCUMENTS sufficient to show the domain names
12 owned by YOU including the entities and/or servers to whom they are registered.

13 **RESPONSE:**

14 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
15 is not proportional to the needs of the case, considering the importance of the issues at stake in the
16 action, the amount in controversy, the parties’ relative access to relevant information, the parties’
17 resources, the importance of the discovery in resolving the issues, and whether the burden or
18 expense of the proposed discovery outweighs its likely benefit.

19 ULC Monastery also objects to this request as vague and ambiguous in its use of “owned”
20 and “servers to whom they are registered.”

21 Without waiving and subject to all objections, documents responsive to the domain names
22 identified and complained about in Defendant AMM’s Answer and Counterclaim are being
23 produced.

1 **REQUEST FOR PRODUCTION NO. 32:** DOCUMENTS consisting of cease-and-desist letters
2 and/or demands either sent or received by YOU.

3 **RESPONSE:**

4 ULC Monastery objects to this request as vague and ambiguous in its use of “cease-and-
5 desist letters” and “demands.” ULC Monastery also objects to this request as overly broad and not
6 likely to lead to the discovery of admissible evidence to the extent it is unlimited regarding the
7 nature of demands being made. Without waving and subject to all objections, responsive
8 documents consisting of letters asserting legal demands in the realm of copyright, Lanham Act,
9 trademark, and defamation claims are being produced in response to these requests.

10
11 **REQUEST FOR PRODUCTION NO. 33:** DOCUMENTS identifying any legal dispute to which
12 YOU have been a party.

13 **RESPONSE:**

14 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
15 is not proportional to the needs of the case, considering the importance of the issues at stake in the
16 action, the amount in controversy, the parties' relative access to relevant information, the parties'
17 resources, the importance of the discovery in resolving the issues, and whether the burden or
18 expense of the proposed discovery outweighs its likely benefit.

19 Without waiving and subject to objections, ULC Monastery has been a party to the
20 following legal actions:

21 4. *Universal Life Church Monastery Storehouse, et. ano. v. Michael Cauley,*
22 W.D. of WA, No. 2:13-CV-00592.

23 5. *The Universal Church., Inc. v. Universal Life Church/ULC Monastery, et.*
24 *al., S.D. of NY., no. 14-CV-5213.*

25 6. *Universal Life Church v. Rodney Krafka and RLK, LLC, King County*
26

1 *Superior Court, no. 17-2-16669-3 SEA / 18-2-11275-3 SEA.*

2 7. *Universal Life Church Monastery Storehouse, et. al. v. Wayne Nabors, et.*
3 *al., M.D. of TN, case no. 2:19-cv-00049.*

4 8. *Universal Life Church Monastery Storehouse v. American Marriage*
5 *Ministries, TTAB, Cancellation no. 92069411.*

6 9. *American Marriage Ministries v. Universal Life Church Monastery*
7 *Storehouse, TTAB, Opposition no. 91237315.*

8 10. *Universal Life Church Monastery Storehouse v. Clark County, et. al., US*
9 *Dist. Ct. of Nevada, 2:18-cv-020999 RFB.*

10 11. *Universal Life Church Monastery Storehouse v. Amy Long / Quest*
11 *Ministries of the Universal Life Church, et. al., FA1501001602375 (Nat. Arb. Forum)*

12 12. *The Universal Church, Inc. v. Universal Life Church Monastery*
13 *Storehouse, Opposition No. 91225430 (TTAB)*

14
15 **REQUEST FOR PRODUCTION NO. 34:** DOCUMENTS demonstrating the current number of
16 users ordained by YOU.

17 **RESPONSE:**

18 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
19 is not proportional to the needs of the case, considering the importance of the issues at stake in the
20 action, the amount in controversy, the parties' relative access to relevant information, the parties'
21 resources, the importance of the discovery in resolving the issues, and whether the burden or
22 expense of the proposed discovery outweighs its likely benefit.
23

24
25 **REQUEST FOR PRODUCTION NO. 35:** DOCUMENTS demonstrating YOUR non-profit
26 status including the history thereof.

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1 **RESPONSE:**

2 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
3 is not proportional to the needs of the case, considering the importance of the issues at stake in the
4 action, the amount in controversy, the parties' relative access to relevant information, the parties'
5 resources, the importance of the discovery in resolving the issues, and whether the burden or
6 expense of the proposed discovery outweighs its likely benefit.

7
8 **REQUEST FOR PRODUCTION NO. 36:** DOCUMENTS demonstrating any trademark
9 application filed by YOU or on YOUR behalf, successful or otherwise.

10 **RESPONSE:**

11 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
12 is not proportional to the needs of the case, considering the importance of the issues at stake in the
13 action, the amount in controversy, the parties' relative access to relevant information, the parties'
14 resources, the importance of the discovery in resolving the issues, and whether the burden or
15 expense of the proposed discovery outweighs its likely benefit, especially given that such
16 documents are equally available to AMM.

17 However, without waiving and subject to all objections, any responsive documents are
18 being produced in response to these requests.

19
20 **REQUEST FOR PRODUCTION NO. 37:** DOCUMENTS identifying any challenge or legal
21 action in which the solemnization of marriage by a minister ordained by YOU is or has been in
22 question.

23 **RESPONSE:**

24 ULC Monastery objects to this request as vague in its use of "been in question." Any
25 responsive documents are being produced in response to these requests.

26
AMERICAN MARRIAGE MINISTRIES' FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS - WITH PLAINTIFF'S RESPONSES THERETO - 46

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SEATTLE, WASHINGTON 98101-3292
PHONE (206) 447-4400 FAX (206) 447-9700

1
2 **REQUEST FOR PRODUCTION NO. 38:** DOCUMENTS demonstrating any analysis or
3 conclusion by YOU as to locations where ordination by YOU is recognized and/or valid.

4 **RESPONSE:**

5 ULC Monastery objects to the extent this request seeks documents covered by attorney-
6 client privilege and/or work product doctrine. Any non-privileged responsive documents are being
7 produced in response to these requests.

8
9 **REQUEST FOR PRODUCTION NO. 39:** DOCUMENTS demonstrating any analysis or
10 conclusion by third parties as to locations where ordination by YOU is recognized and/or valid.

11 **RESPONSE:**

12 Any non-privileged or non-protected responsive documents are being produced in response
13 to these requests.

14
15 **REQUEST FOR PRODUCTION NO. 40:** DOCUMENTS demonstrating that YOU contend that
16 any statements made by AMM (including, but not limited to, those referenced in Paragraphs 39
17 and 57 of YOUR Complaint) are false.

18 **RESPONSE:**

19 ULC Monastery objects to this request as vague and ambiguous, and ULC Monastery is
20 not clear what is being requested. As best ULC Monastery understands this Request, please see
21 the documents produced in response to these discovery requests. In addition, discovery has just
22 begun and is continuing. ULC Monastery reserves the right to supplement its response to this
23 Request in accordance with the Fed.R.Civ.Pro.

24
25 **REQUEST FOR PRODUCTION NO. 41:** DOCUMENTS identifying any individuals YOU
26

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1 contend have been deceived or confused by statements allegedly made by AMM.

2 **RESPONSE:**

3 Any responsive documents are being produced in response to these requests.

4
5 **REQUEST FOR PRODUCTION NO. 42:** DOCUMENTS YOU contend demonstrate any loss
6 of income.

7 **RESPONSE:**

8 ULC Monastery objects to this Request as not relevant to any party's claim or defense, and
9 is not proportional to the needs of the case, considering the importance of the issues at stake in the
10 action, the amount in controversy, the parties' relative access to relevant information, the parties'
11 resources, the importance of the discovery in resolving the issues, and whether the burden or
12 expense of the proposed discovery outweighs its likely benefit, because ULC Monastery is not
13 requesting damages based upon loss of income, and because injury is presumed as a matter of law.

14
15 **REQUEST FOR PRODUCTION NO. 43:** DOCUMENTS evidencing any damages to which
16 YOU claim YOU are entitled.

17 **RESPONSE:**

18 Any responsive documents are being produced in response to these requests.

CERTIFICATION

The undersigned hereby states that he is an attorney for Plaintiff Universal Life Church Monastery Storehouse and certifies that the answers and responses set forth in the above discovery requests were made in compliance with Fed. R. Civ. P. 26(g).

Dated this 7th day of August 2019.

By: Michael B. Shultz

Attorney for Plaintiff ULC Monastery

VERIFICATION

I, Paul G. Goss, as Creations Manager of Plaintiff Universal Life Church Monastery Storehouse, have read the foregoing answers to interrogatories, know the contents thereof, and believe the same to be true and correct to the best of my knowledge.

Dated this 9 day of August 2019.



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